

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:)	
)	
NATIONAL FORGE COMPANY, <i>et al.</i> ,)	
)	
Debtor.)	
)	
OFFICIAL COMMITTEE OF UNSECURED)	Civil Action No. 04-21 (Erie)
CREDITORS OF NATIONAL FORGE)	
COMPANY,)	Hon. Sean J. McLaughlin
)	
Plaintiff,)	
)	
v.)	
)	
E. ROGER CLARK, both Individually and/or as)	
an Officer and/or Director of National Forge)	
Company and/or National Forge Company)	
Holdings, Inc.; MAURICE J. CASHMAN, both)	
Individually and/or as an Officer and Director of)	
National Forge Company and/or National Forge)	
Company Holdings, Inc. ;DANA BEYELER,)	
both Individually and/or as an Officer of)	
National Forge Company; ROBERT A.)	
KAEMMERER, both Individually and/or as an)	
Officer of National Forge Company)	
and/or National Forge Company Holdings, Inc.;)	
THOMAS H. JACKSON, both Individually)	
and/or as an Officer of National Forge Company,)	
Inc.; CHARLES R. OLSON, both Individually)	
and/or as an Officer of National Forge Company,)	
Inc.; DANIEL ANTOS; WILLIAM D. BAILEY;)	
RICHARD A. BREWSTER; JAMES E.)	
CALDWELL; LARRY CAMPBELL; JAMES)	
C. CONFER; RICHARD D'ALESSANDRO;)	
DONALD FISSEL; JAMES B. HARRIS;)	
ASHOK K. KHARE; CARL J. LUCCINO;)	
CLARENCE E. MASON; HAROLD MURPHY;)	
PHILIP R. NONOSEL; JAMES D. RUHLMAN;)	
PHILLIP R. SIMONS; GLENN E. TURK;)	
RONALD L. YOUNG; BARRY ZISCHKAU;)	
JP MORGAN CHASE & CO., as Lender and)	
Agent on Behalf of Certain Lenders Under)	
Various Amendments to Amended and Restated)	caption continued

Credit Agreement dated April 6, 1998; FLEET)
BUSINESS CREDIT; NATIONAL CITY)
BANK OF PENNSYLVANIA,)
)
Defendants.)
)

JOINT MOTION TO SUBSTITUTE DEFENDANTS

Now come, Plaintiff Official Committee of Unsecured Creditors of National Forge Company, Defendants listed above, Non-party JPMorgan Chase Bank, NA, and Official Committee of Retirees of National Forge Company and file this Joint Motion to Substitute Defendants as follows:

1. The parties have determined that JPMorgan Chase & Co. was inadvertently named as a defendant, and the appropriate defendant is JPMorgan Chase Bank, NA.
2. Defendant Fleet Business Credit Corporation has merged into and is now known as Bank of America, NA.

WHEREFORE, the parties respectfully request that an order in the form attached hereto be entered substituting as defendants JPMorgan Chase Bank, NA for JPMorgan Chase & Co. and Bank of America, NA for Fleet Business Credit Corporation.

Respectfully submitted,

Dated: August 15, 2006

/s/ John M. Steiner

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 America, NA; National City Bank of
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Robert A. Kaemmerer

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Richard D'Alessandro; Donald Fissel; James
B. Harris; Thomas H. Jackson; Ashok K.
Khare; Carl J. Luppino; Clarence E. Mason;
Harold Murphy; Philip R. Nonosel; Charles R.
Olson; James D. Ruhlman; Philip R. Simons;
Glenn E. Turk; Ronald L. Young; Barry
Zischkau

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on this 15th day of August, 2006, I served or caused to be served a copy of the foregoing Joint Motion to Substitute Defendants via electronic mail upon the following:

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/s/ Joel M. Walker

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